

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

**SUSAN JOHNSON, individually and on  
behalf of her minor son 'B.L.', and on  
behalf of DERRICK THOMPSON,  
deceased,  
Plaintiff**

**v.**

**CITY OF BIDDEFORD, BIDDEFORD  
POLICE DEPARTMENT, a Municipal  
Corporation organized and existing under  
the laws of the State of Maine; MAINE  
DEPARTMENT OF PUBLIC SAFETY, a  
state agency organized under the laws of the  
State of Maine; JOHN E. MORRIS,  
individually and as the Commissioner of the  
Maine Department of Public Safety;  
ROGER BEAUPRE, individually and as  
Chief of Biddeford Police Department;  
EDWARD DEXTER, individually and as an  
employee of the Biddeford Police  
Department; JACOB WOLTERBEEK,  
individually and as an employee of the  
Biddeford Police Department and JANE  
DOE,  
Defendants**

**Civil Action No. 17-cv-00264-JDL**

**JOCELYNE WELCH, As Personal  
Representative of the Estate of Alivia  
Welch,  
Plaintiff**

**v.**

**CITY OF BIDDEFORD, a Municipal  
Corporation organized and existing under  
the laws of the State of Maine; ROGER  
BEAUPRE, individually and as Chief of  
Biddeford Police Department; EDWARD  
DEXTER, individually and as an employee  
of the Biddeford Police Department;  
JACOB WOLTERBEEK, individually and  
as an employee of the Biddeford Police  
Department,  
Defendants**

**Civil Action No. 18-cv-00160-JDL**

The parties hereto, Defendants, City of Biddeford, Biddeford Police Department, Roger P. Beaupre, Edward Dexter and Jacob Wolterbeek and the Plaintiffs in Civil Action No. 17-cv-00264-JDL; Susan Johnson, individually and on behalf of her minor son 'B.L.', and on behalf of Derrick Thompson, deceased; and Plaintiff in Civil Action No. 18-cv-00160-JDL; Jocelyne Welch, As Personal Representative of the Estate of Alivia Welch hereby move this Court to consolidate for the remainder of the litigation both captioned actions.

As grounds therefor, the parties state:

1. Judicial economy will best be served by the consolidation of the Johnson and Welch matters under one proceeding for the remainder of pretrial discovery, motion practice and possible trial;
2. The operative incident facts and claims asserted are identical in both proceedings as the claims arise out of the same incident and the defendants name in both actions are identical;
3. The parties in both proceedings have informally been conducting discovery jointly so as to avoid duplication and it is anticipated that the defendants having given notice of intent to file for Summary Judgment will assert the same legal arguments in both matters.

For the above-stated reasons, the parties move that the Johnson and Welch matters be consolidated by the Court.

Respectfully submitted,  
Plaintiff,  
Susan Johnson, individually and on behalf of  
her minor son 'B.L.', and on behalf of Derrick  
Thompson, deceased,

*/s/ Kristine C. Hanly*

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Respectfully submitted,  
Defendants, City of Biddeford, Biddeford  
Police Department, Roger P. Beaupre, Edward  
Dexter and Jacob Wolterbeek,  
By their attorney,

*/s/ Douglas I. Louison*

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Respectfully submitted,  
Plaintiff,  
JOCELYNE WELCH, As Personal  
Representative of the Estate of Alivia Welch

*/s/ Sarah A. Churchill*

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